

also has diversity jurisdiction under 28 U.S.C. § 1332(a) because the parties are citizens of different states and the amount in controversy exceeds \$75,000.00.

COUNT I - PATENT INFRINGEMENT

4. On December 31, 1985, U.S. Patent No. 4,562,341 ("the '341 patent") duly and legally issued to Ohmac, et al. for an "Electronic Cash Register". Upon information and belief, Verve is the owner by assignment of the '341 patent.

5. Upon information and belief, Thales has directly, indirectly, contributorily, and/or by inducement willfully infringed the '341 patent by making, using, selling, and offering for sale products which embody the inventions claimed in said patent, or colorable imitations thereof. Upon information and belief, Thales sells and offers to sell its infringing products in this judicial district and elsewhere in the United States.

WHEREFORE, Plaintiff prays that the Court enter judgment, as follows:

a. That Plaintiff be awarded, in an amount to be proven at trial, damages adequate to compensate it for the Thales' infringement of the '341 patent, but in no event an amount less than the reasonable royalty for the use made of the invention by the Thales, together with interest and costs as fixed by the court pursuant to 35 U.S.C. § 284;

b. That the Court determine to increase the damages three times for Thales' willful infringement pursuant to 35 U.S.C. § 284;

c. That the Court determines this to be an exceptional case and award Plaintiff its reasonable attorney fees, as provided for by 35 U.S.C. § 285; and


d. That Plaintiff be awarded such other and further relief as the Court may deem is just, proper and equitable.

JURY DEMAND

Plaintiff demands a trial by jury.

Dated this 21st day of March, 2005.

Respectfully submitted,
SIMON, GALASSO & FRANTZ PLC

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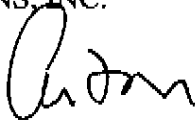
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Christopher S. Walton, hereby certify that a copy of the foregoing was caused to be served on
the 22nd day of March, 2005 upon the following in the manner indicated:

UNITED STATES MAIL POSTAGE PREPAID

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Christopher S. Walton